

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA, STATE OF
NORTH CAROLINA, STATE OF
CALIFORNIA, STATE OF COLORADO,
STATE OF CONNECTICUT, STATE OF
ILLINOIS, COMMONWEALTH OF
MASSACHUSETTS, STATE OF MINNESOTA,
STATE OF OREGON, and STATE OF
TENNESSEE,

Plaintiffs,

vs.

No. 1:24-cv-00710-WLO-JLW

REALPAGE, INC.; CAMDEN PROPERTY
TRUST; CORTLAND MANAGEMENT, LLC;
CUSHMAN & WAKEFIELD, INC.;
GREYSTAR REAL ESTATE PARTNERS,
LLC; LIVCOR, LLC; PINNACLE
PROPERTY MANAGEMENT SERVICES, LLC;
and WILLOW BRIDGE PROPERTY
COMPANY, LLC,

Defendants.

**STIPULATION REGARDING SUBSTITUTION
OF GREYSTAR MANAGEMENT SERVICES, LLC, AS PARTY DEFENDANT**

Plaintiffs United States of America, and the States of
North Carolina, California, Colorado, Connecticut, Illinois,

Minnesota, Oregon, and Tennessee, and the Commonwealth of Massachusetts, acting by and through their respective Attorneys General (collectively, "Plaintiffs"); and Defendant Greystar Real Estate Partners, LLC ("GREP"), by and through its counsel, hereby stipulate and agree as follows:

1. On January 7, 2025, Plaintiffs filed and served an amended Complaint, (Doc. 47), naming GREP as an additional defendant in this action.

2. On April 10, 2025, GREP moved to dismiss the Complaint under Rule 12(b)(6) of the Federal Rules of Civil Procedure, (Doc. 130). Together with certain other defendants, GREP also jointly moved to dismiss the Complaint under Rule 12(b)(6) of the Federal Rules of Civil Procedure, (Doc. 128).

3. After meeting and conferring with counsel for GREP and for Greystar Management Services, LLC ("GMS"), Plaintiffs hereby voluntarily dismiss their action against GREP without prejudice, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, and with the consent of GREP and GMS, substitute in GREP's place GMS as the party defendant. For the avoidance of doubt, this is a substitution of party, and both Plaintiffs' claims, now against GMS, remain pending.

4. As a result of this substitution of party, the Complaint, (Doc. 47), is hereby amended as follows:

a. "Greystar Real Estate Partners, LLC" is stricken from the caption and replaced with "Greystar Management Services, LLC."

b. All references, explicit and implicit, to "Greystar" in the body of the Complaint (including Paragraphs 5, 19, 25, 87-90, 93, 97-99, 104, 129, 156, 167, 170, 199, & 206, and footnote 2) shall refer to "Greystar Management Services, LLC."

c. Paragraphs 246-48, as amended, now read as follows:

246. The Court has personal jurisdiction over Greystar Management Services, LLC ("Greystar"); venue is proper in this District under Section 12 of the Clayton Act, 15 U.S.C. § 22, and under 28 U.S.C. §1391 because Greystar transacts business and resides within the District.

247. Greystar is a privately-owned company organized under the laws of the State of Delaware and is headquartered in Charleston, South Carolina. Greystar is registered to do business in the State of North Carolina. Greystar, through one of its subsidiaries, manages multiple multifamily rental properties using AIRM within this District.

248. Greystar engages in, and its activities substantially affect, interstate trade and commerce. Greystar, including through subsidiaries, manages multifamily rental units across the United States, including within this District. Greystar provides a range of products and services that are marketed and offered to consumers throughout the United States and across state lines.

5. GMS withdraws the individual motion to dismiss filed by GREP (Doc. 130), and joins defendants' joint motion to dismiss (Doc. 128) in GREP's place.

6. Plaintiffs and GREP and GMS, through their respective counsel, respectfully ask that the Court enter an order substituting a party defendant and amending the Complaint as set forth above.

Dated: May 29, 2025

Respectfully submitted,

By: *s/ Henry C. Su*

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: *s/ Henry C. Su*

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